

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

**JAMES LEE SONS, individually, and on
behalf of the wrongful death beneficiaries
of JAMES ALLEN PARKS SONS, deceased**

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16 –CV-181-MPM-RP

BENTON COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

MOTION TO FILE EXHIBIT UNDER SEAL

Come Now the Defendants in this case, and pursuant to Rule 79 of the Local Civil Rules for the Northern District of Mississippi, request that they be allowed to file Exhibit 1 to their Third Motion in Limine under seal, and in support thereof would show as follows:

1.

Exhibit 1 to the Defendants' Third Motion in Limine consists of sixty-five (65) photographs that depict the corpse of the decedent. The Court has already sealed the video of the decedent's suicide, and the Defendants' likewise request that this Court allow them to file Exhibit 1 under seal. The photographs are graphic in nature and frankly gruesome. There is no dispute as to cause of death or the manner in which the decedent committed suicide. As such, there is no public interest served in allowing these photographs to be included in the public record at this time.

WHEREFORE, PREMISES CONSIDERED, the Defendants respectfully request that they be allowed to file Exhibit 1 to their Third Motion in Limine under seal. The Defendants would also request any other relief which the court may find warranted in the premises.

Respectfully submitted, this the 31st day of August, 2017.

CLAYTON O'DONNELL, PLLC
1300 Access Road, Suite 200
P.O. Drawer 676
Oxford, MS 38655
Telephone: (662) 234-0900
Facsimile: (662) 234-3557

s/ S. Ray Hill, III

S. RAY HILL, III, MSB# 100088
rhill@claytonodonnell.com

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2017, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to all counsel of record.

s/ S. Ray Hill, III

S. RAY HILL, III, MSB# 100088